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WHC-MR-0403

Tri-Party Agreement Milestone Summary

October 1992

Prepared for the U.S. Department of Energy



Hanford Operations and Engineering Contractor for the U.S. Department of Energy under Contract DE-AC06-87RL10930



Approved for Public Release

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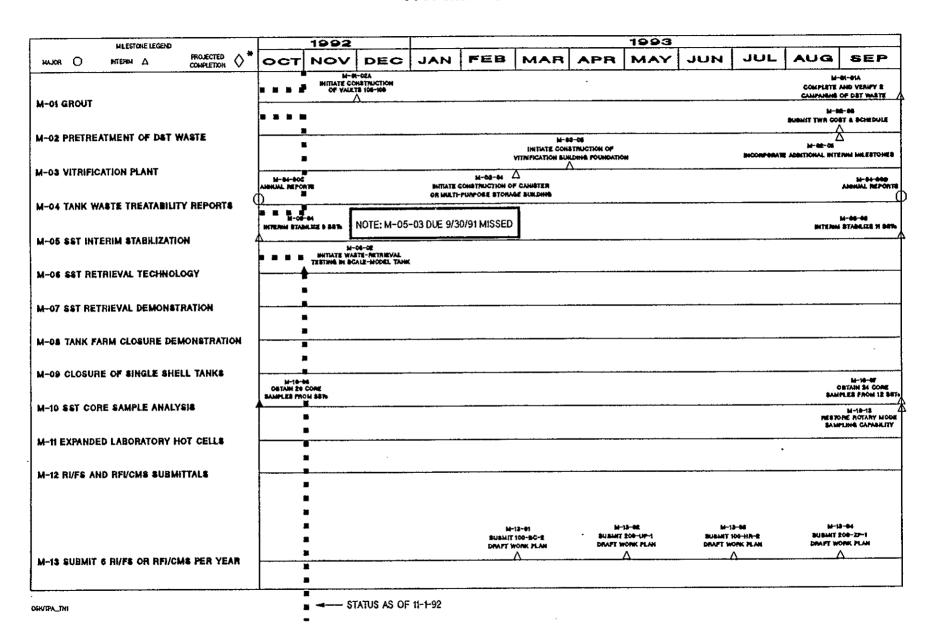
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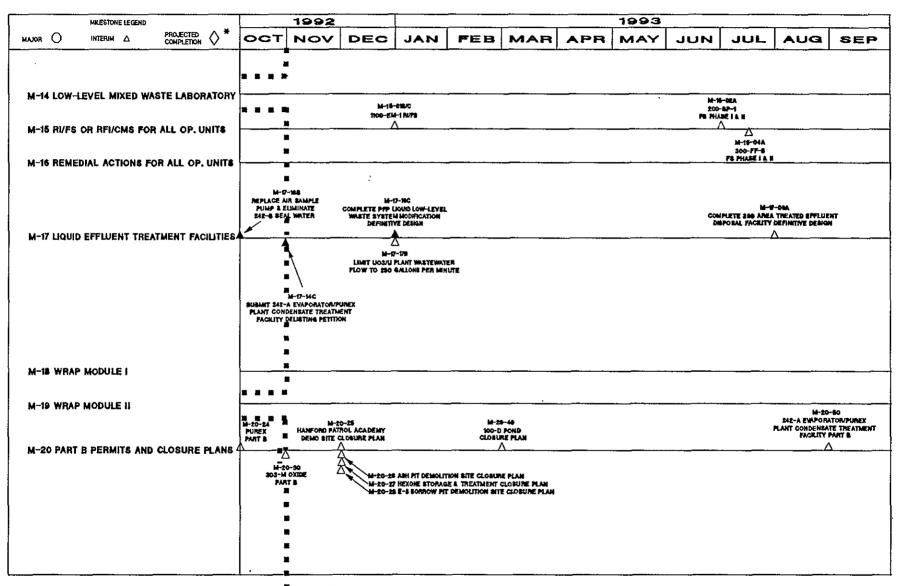


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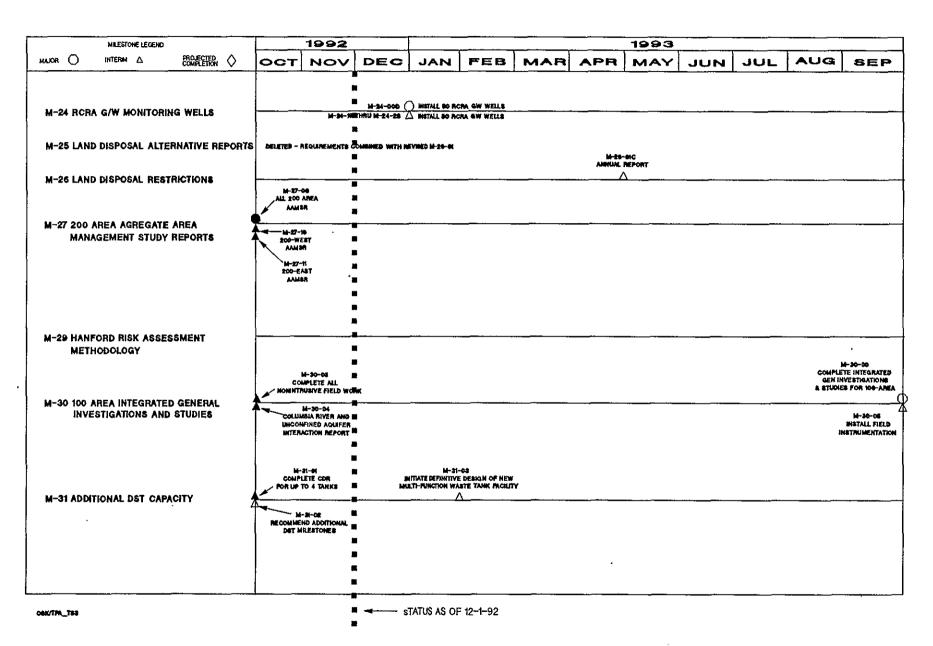
9 3 TPA MILESTONES 1





→ STATUS AS OF 11-1-92

9 3 1 2 7 5 2 0 4 4 3 TPA MILESTONES



TRI-PARTY AGREEMENT BUDGET BASELINE SUMMARY OCTOBER 1992

"Tri-Party Agreement milestone cost and budget status will not be available for this reporting month. This is a result of delays experienced in establishing FY93 budget baselines for Tri-Party Agreement milestones in the Financial Data System. We expect our baselines will be established in time for November reporting of Tri-Party Agreement milestone cost and budget information."

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MAJOR MILESTONE: M-01-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: G. H. Sanders

MANAGER: J. L. Epstein

BASELINE DATE: December 1996

PROJECTED DATE: TBD

DESCRIPTION:

Completion of 14 Grout Campaigns.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	BASELINE	PROJECTED *
ហ	M-01-02A	Initiate construction of vaults 106-109.	11/92	TBD
Stations of the state of the st	M-01-01A	Complete and Verify 2 Campaigns of Double-Shell Tank Waste (This Includ One Campaign of Phosphate-Sulfate Wa	9/93 les aste).	10/94
C'	*	Projected dates reflect TPA Change Requ	uest M-01-92-01	A

ACCOMPLISHMENTS

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- o The Grout PA Base Case description was reviewed by the Grout PA Steering Committee.
- o The PA Modeling Team have obtained initial flow and transport results with doses for the grout base case. The peak dose rate is about 27 mrem/yr for the full garden scenario and about 9.5 mrem/yr for the drinking water scenario. This peak occurs about 100,000 years after disposal.
- o Draft Grout Technology Plan was issued.
- o DOE-RL FSAR comments are being resolved in preparation of FSAR transmittal to HQ.
- o Candidate Project Support Sheets for Grout Operations maintenance facility and access to LCT/MM were submitted as candidate FY 1994 GPPs.
- Cover blocks for the vault pit excess water pits and leachate pit are being poured. Protective coating is being applied to the vault pit, excess water pits, and leachate pit for all vaults.
- o 100% design review of vendor exhauster fabrication drawings is complete. Fabrication is in process.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Vault work is focused on fabrication of cover blocks for leachate pits and installation of piping and piping support between the grout facility and the vaults.
- o Continue development of resource loaded integrated schedules.
- o Continue work on Double Shell Tank Vault Closure Plan which includes a section addressing the impacts of gas generation/mitigation.
- o Continue developing non-destructive testing techniques associated with vault 102.

MILESTONE STATUS/PROBLEMS/ISSUES

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- o Rework on Performance Assessment (HQ Peer Review Panel Comments/Recommendations) has had a major impact on resources and meeting of milestones. This rework is the major driver for delaying Grout TPA milestones.
 - o Heat of hydration and the time necessary to pour a grout campaign to assure a "good" grout may impact the timely completion of grout milestones.
 - o NRC delay in reaching a decision on the Washington State and Oregon petition for HLW is creating program planning uncertainties.
- o With respect to M-01-02A and TPA change request M-01-92-01A, given the issues before the TPA signatories on the Hanford Grout Disposal Program (HEDP), it is unwise to spend scarce manhours or funds on M-01-02A efforts until such time as those issues are resolved. DOE will request a waiver to M-01-02A until agreement is reached on HEDP issues.
 - The startup of the Grout Treatment Facility and the initiation of grout vault 102 filling in time to meet the M-O1-O1A milestone (Complete and verify two campaigns of double shell tank waste by 1993) is highly unlikely.

MAJOR MILESTONE: M-02-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: Leif Erickson MANAGER: W. C. Miller

BASELINE DATE: TBD PROJECTED DATE: TBD

DESCRIPTION: Initiate pretreatment of double-shell tank (DST) waste.

Double-shell tank waste pretreatment is required prior to disposal of high-activity tank wastes. Pretreatment supports the removal, treatment, and final disposal of wastes subject to land disposal restrictions stored in DSTs. Removal of the wastes from the DSTs and disposal in grout or glass will allow DST space to be made available for single-shell tank waste.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR THE NEXT 12 MONTHS

ε.;+ <u>-1</u>	MILESTONE	<u>Description</u>	<u>BASELINE</u>	<u>PROJECTED</u>
G C	M-02-03	Submit Tank Waste Remediation System Baseline Scope, Cost, and Schedule.	8/31/93	8/31/93
ÇVI	M-02-05	Incorporate Additional Interim. Milestones to Support Pretreatment	8/31/93	8/31/93
5		of Double-Shell Tank Waste		

ACCOMPLISHMENTS

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o Made substantial progress in the development of plans and schedules for Fiscal Year 1993 retrieval and pretreatment work scope supporting the M-02-00 milestone, as part of the TWRS Fiscal Year Work Plan.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- o Complete development of plans and resource loaded schedules for waste retrieval and pretreatment, as part of TWRS rebaselining.
- o Prepare a retrieval program plan and technology development plans for retrieval and pretreatment.
- O Complete a study to establish the near-term DST/SST retrieval sequence in support of pretreatment of tank wastes.
- o Complete an engineering study on waste pretreatment feed optimization (blending).
- O Complete an engineering study to identify preferred waste treatment processes (including cesium ion exchange) and facility configuration for

the tank safety treatment module, to support resolution of watch list tank safety issues and for pretreatment for low level waste disposal.

MILESTONE STATUS/PROBLEMS/ISSUES

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o Resource loaded schedules demonstrating ability to meet establised milestones are not yet complete.

MAJOR MILESTONE: M-03-00 STATUS FOR END OF MONTH: OCTOBER, 1992

DOE DIRECTOR: R. W. Brown MANAGER: R. A. Smith

BASELINE DATE: December 1999 PROJECTED DATE: December 1999

DESCRIPTION:

Initiate Hanford Waste Vitrification Plant (HWVP) Operations.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	<u>Milestone</u>	<u>Description</u>	<u>Baseline</u>	<u>Projected</u>
9	M-03-04	Initiate Construction of	2/93	2/93
Finise		the Canister Storage Bldg. or Multi-Purpose		
E-M		Storage Complex.		
O	M-03-05	Initiate Construction of	3/93	3/93
6		the Vitrification Bldg. Foundation.		
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- o Transmitted PSAR Rev. O to DOE/HQ for review and approval.
- o HWVP Rad-Air Notice of Construction Permit Application (Clean Air Act) approved by RL and submitted to regulatory agencies.
- o Site preparation in support of initiation of construction on the Vitrification Building foundation (3/93) and the Canister Storage Building (2/93) is continuing.
- Detail Design is continuing (47% complete).

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- o Issue HWVP Applied Technology Plan.
- o Start excavation for the Canister Storage Building and Vitrification Building.

MILESTONE STATUS/PROBLEMS/ISSUES

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- o TWRS program rebaselining including uncertainties associated with pretreated feed for the HWVP Project is undergoing evaluation. Completion is planned for March 1993. An HWVP issue paper addressing the uncertainties is being developed.
- o Key Decision 3B, Approval to Commence Construction, must be received in November 1992 to be able to satisfy interim milestones M-03-04 and M-03-05. Approval is expected by November 18, 1992.

MAJOR MILESTONE: M-04-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR : Lief Erickson

MANAGER: W. C. Miller

BASELINE DATE: September 30, 1992

PROJECTED DATE: September 30, 1992

DESCRIPTION:

Provide annual reports of tank waste treatability studies.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE	DESCRIPTION	<u>BASELINE</u>	PROJECTED
M-04-00D	Provide Annual Report of Tank Waste Treatability Studies.	09/93	09/93

ACCOMPLISHMENTS

The "Annual Report of Tank Waste Treatability Studies" was completed and submitted to Ecology and the EPA on September 29, 1992. This completes Milestone M-04-00C.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

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MILESTONE STATUS/PROBLEMS/ISSUES

None 0

MAJOR MILESTONE: M-05-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. E. Gerton

MANAGER: R. E. Raymond

BASELINE DATE: September 1995

PROJECTED DATE: TBD

DESCRIPTION:

Complete Single-Shell Tank Interim Stabilization.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	<u>BASELINE</u>	PROJECTED
	M-05-03	Interim stabilize an additional 4 single-shell tanks (SST).	9/91	TBD
N N	M-05-04	Interim Stabilize an additional 9 SSTs.	9/92	TBD
ন্দ ত	M-05-05	Interim Stabilize an additional 11 SSTs.	9/93	TBD

ACCOMPLISHMENTS

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- Provided the basis for current water addition practices and status on measures to minimize water additions to tanks C-105 and C-106 to the regulators, in response to requests by the Washington State Department of Ecology (Ecology).
- Implemented monthly psychrometric measurements for increased leak detection capabilities around tanks C-105 and C-106, in response to requests by Ecology. 9
 - Reduced the logging speed of gross gamma probes for the 14 dry wells 0 around tanks C-105 and C-106. This will improve the credibility of the tank leak detection data obtained around these two tanks. This was in response to requests by Ecology.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Meet with regulators and develop a new Tri-Party Agreement change 0 package for FY 1992 and beyond nonwatchlist tank stabilizations.
- Pressure test the transfer lines in C-Farm. 0
- Provide a revised contingency plan for responding should a leak occur from tank C-106, in response to a request by Ecology.
- Complete physical logging of the 14 dry wells around tanks C-105 and 0 C-106 using a spectral gamma probe, at the request of Ecology.

O Develop and provide a plan for further enhancements in gross gamma probe logging of the dry wells, in response to a request by Ecology.

MILESTONE STATUS/PROBLEMS/ISSUES

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- Monitoring of surface levels in SSTs identified two tanks that have reached or exceeded their established decrease criteria, leading to concerns of new tank leaks. The tanks are 241-SX-103 and 241-SX-105. The two methods for in-tank surface level measurements conflict on the data; one indicating a surface level drop, and the other indicating a constant surface level at or near baseline. None of the external monitoring systems confirm a tank leak. Work continues to investigate the surface level changes and to determine if indeed either or both of these tanks are leaking.
- In September 1992 tank 241-T-101 was declared an assumed leaker, and steps are underway to remove the drainable liquid to at least a level which will cease discharging waste to the surrounding soils. Engineering and safety reviews have been conducted, and systems are being put into place to commence the drainable liquid removal as quickly as it is safe and prudent to do so.
 - A Tri-Party Agreement Change Request form was processed to the regulators by the DOE, which added new tank leak detection and response milestones, and delayed interim milestone M-05-04 by four months. This change package was denied by Ecology. DOE has invoked Dispute Resolution, per the Tri-Party Agreement. Discussions toward resolving the issues have been scheduled, but personnel scheduling has precluded conducting the meeting. Discussions are now scheduled to occur in November 1992.
 - A "Creation of Danger," as defined in Article 31 of the Tri-Party Agreement, was declared on January 28, 1992. For personnel safety reasons, a work restriction was placed on all SST farms, and fresh air is required to operate within the boundaries of three farms. On February 28, 1992, all waste transfers in the 200 Area tank farms were halted because of concerns on fissile material inventory. The cessation on waste transfers continues. The impacts to the Tri-Party Agreement will result in a proposed Tri-Party Agreement Change Request.
- A safety question was raised regarding the hazards associated with removing liquid from SSTs and the resultant drying of the wastes potentially causing increases in tank content temperatures. Analyses and studies continue on this question.
- The FY 1991 stabilization milestone (M-05-03) was missed in Sept. 1991. Conditions in S-Farm and continuing safety concerns make it impossible to meet the baseline FY 1992 milestone (M-05-04). Discussions with the Regulators have commenced, with the intent to arrive at a joint consensus on new schedules for the stabilization program, or to jointly identify a mutually agreeable future for this activity. A change package requesting an extension of milestone M-05-04 was submitted to the regulators; however, it was denied. Consequently, RL has invoked the Dispute Resolution clause of the Tri-Party Agreement.
- o Tank Farm vapor issues continued as a Priority 1 safety item.

New tank leak information has renewed concerns over progress towards meeting this milestone.

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MAJOR MILESTONE: M-06-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: L. Erickson MANAGER: W. C. Miller

BASELINE DATE: June 1994 PROJECTED DATE: June 1994

DESCRIPTION:

Develop single-shell tank waste retrieval technology and complete scale-model testing.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION BASELINE PROJECTED

NONE

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ACCOMPLISHMENTS

o Ecology has forwarded a letter of congratulations on achieving the Interim Milestone M-06-02, stating the excellence of progress towards waste retrieval indicated by the demonstration.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Conduct follow-on demonstrations for senior members of Tri-Party Agreement organizations, the public, and the media. These demonstrations will roughly parallel the demonstration used to meet Interim Milestone M-06-02.
- o Continue robotic test-bed testing and development, to define prototype retrieval system performance requirements. Upgrades to the robotics system and test bed will continue towards meeting the major milestone. These upgrades will include enhancement of robotic test-bed, simplified controls, and realistic dislodging and conveyance equipment.
- o Define, specify, and select options for waste dislodging and conveyance test units.
- o Discuss with the regulators the milestone completion definition plan.

MILESTONE STATUS/PROBLEMS/ISSUES

o This milestone is on schedule.

MILESTONE STATUS/PROBLEMS/ISSUES

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The preliminary strategy for SST retrieval includes two reference technologies, sluicing and long-reach manipulator systems. The retrieval demonstration under M-07 will be initiated with sluicing technology. Significant development work is required before deployment of additional retrieval technologies. The long-reach manipulator system (or alternate technology) will be deployed to complete the retrieval demonstration if sluicing cannot achieve the 95% waste retrieval criteria for the M-07 demonstration.

If sluicing is not accepted for the M-07 retrieval demonstration, this milestone may require a TPA change request because of a lack of available commercial technology, multi-year development efforts, and procurement lead time restrictions.

MAJOR MILESTONE: M-07-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: L. Erickson

MANAGER: W. C. Miller

BASELINE DATE: October 1997

PROJECTED DATE: October 1997

DESCRIPTION:

Initiate full-scale demonstration of waste retrieval technology.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	<u>DESCRIPTION</u>	BASELINE	<u>PROJECTED</u>
7	M-07-01	Submit SST selection criteria retrieval options and recommend tank selection to Ecology for concurrence.	10/93	01/93
(O)	M-07-02	Ecology concurrence/nonconcurrence of SST selection criteria, retrieval options and tank selection.	12/93	03/93
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ACCOMPLISHMENTS

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- ... Comments have been developed by the U.S. Department of Energy, Richland Field Office (RL) on the draft plan on SST selection criteria and retrieval options leading to M-07-01 (due 10/93), and they are in process of incorporation. M
- A plan on the early retrieval of tank C-106 has been delivered to the O 0 regulators for their review.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Submit the tank selection criteria required by milestone M-07-01. 0 Ecology then has two months to provide comments to the criteria and to concur with the recommended tank (M-07-02).
- Develop a detailed plan for M-07-00 achievement, integrated with M-06-00 0 and the Underground Storage Tank Integrated Demonstration activities. Propose revisions to the M-07 interim milestones based on the detailed schedules.
- Complete preliminary analyses on potential leaks from tank 241-C-106 0 during sluicing retrieval of the waste. Review the results of this work with regulators.
- Obtain regulator concurrence on sluicing as an acceptable method for 0 tank waste retrieval.

MAJOR MILESTONE: M-08-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: L. Erickson

MANAGER: W. C. Miller

BASELINE DATE: June 2004

PROJECTED DATE: June 2004

DESCRIPTION:

Initiate full-scale tank farm closure demonstration project.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE

DESCRIPTION

BASELINE

PROJECTED

None

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ACCOMPLISHMENTS

o No significant accomplishments this month.

PLANNED ACTIONS FOR NEXT 6 MONTHS

- o Initiate studies on selection of the tank farm to meet the M-08-00 milestone, thereby accomplishing the M-08-01 interim milestone.
- o Initiate interface planning on the actions required by both retrieval and closure activities.

MILESTONE STATUS/PROBLEMS/ISSUES

o This milestone is on schedule.

MAJOR MILESTONE: M-09-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: E. A. Bracken MAI

MANAGER: R. J. Wojtasek

BASELINE DATE: June 2018

PROJECTED DATE: June 2018

DESCRIPTION:

Complete closure of all 149 SSTs.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE

DESCRIPTION

BASELINE

PROJECTED

None

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ACCOMPLISHMENTS

The final draft Notice of Intent (NOI) for the Tank Waste Remediation System (TWRS) Environmental Impact Statement (TWRS-EIS) is still in the U.S. Department of Energy (DOE) approval cycle. Recent comments by the DOE General Counsel indicate that substantial rework will be required prior to publication. No new projected date for publication has been established.

o The public scoping process for the Hanford Remedial Action Environmental Impact Statement (HRA/EIS), following publication of the NOI, has been accomplished. The NOI was well received by the public and comments are being incorporated.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- o Redefine SST waste disposal strategy under the Tank Waste Remediation System Decision Plan.
 - o Issue to the Federal Register a NOI for the TWRS-EIS for tank remediation at the Hanford Site.

MILESTONES STATUS/PROBLEMS/ISSUES

- This milestone is on schedule; however, it may be in jeopardy unless preclosure activities can be accelerated. The activities requiring acceleration include: SEIS ROD preparation, SST Waste and Field Characterization, Technology Development, and concurrent permitting with facility design.
- o Issued the field characterization work plan to support GAO Audit item (GAO-RCED-89-157) to the regulators in August 1992. Ecology now believes they have right of approval to the work plan and are potentially stopping work.

MAJOR MILESTONE: M-10-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. E. Gerton

MANAGER: J. G. Propson

BASELINE DATE: September 1998

PROJECTED DATE: September 1998

DESCRIPTION:

Complete analyses of at least two complete core samples from each SST.

PAST DUE AND SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

<u>MILESTONE</u>	<u>DESCRIPTION</u>	<u>BASELINE</u>	<u>PROJECTED</u>
M-10-07	Obtain 24 core samples from 12 SSTs	9/93	9/93
M-10-13	Restore rotary mode sampling capability at the Hanford Site	9/93	9/93

ACCOMPLISHMENTS

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- Completed readiness review for sampling a ferrocyanide tank T-107.
- Completed the Master Core Sampling Schedule detailing the waste tank sampling schedule through 1998 based on current TWRS priorities.
- Completed almost all assembly requirements for the hard saltcake sampler and hydrostatic system, and are preparing to conduct acceptance test procedures.
- Met with Ecology and Washington Department of Health personnel and received approval to employ an off-the-shelf exhauster for the rotary mode sampling system, employing Best Available Commercial Technology (BACT).
- Initiated tank sampling on tank T-107. 0

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Continue rotary mode sampling testing and implementation. 0
- 0 Issue the Tank Waste Remediation (TWR) Waste Characterization Plan. This rewrite of the SST Waste Characterization Plan will incorporate all TWR requirements into a single plan.
- Commence discussions with the Regulators to accommodate unaccounted-for 0 cores in the major milestone and to address tank waste remediation efforts. Interim milestones M-10-07 through M-10-12 will be affected.

MILESTONE STATUS/PROBLEMS/ISSUES

- o The major milestone is on schedule; however, interim milestones M-10-07 through M-10-12 are in jeopardy.
- The core sampling capability currently exceeds the analytical throughput and reporting capabilities of the laboratories. Facility and equipment upgrades are in process to improve the throughput and reporting capabilities. Studies are being conducted to determine an approach that would be most beneficial to the overall program and to specify what relief and/or modifications to the agreement may be required.

MAJOR MILESTONE M-11-00 STATUS FOR END OF MONTH OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER: M. L. Bell

BASELINE DATE: June 1994

PROJECTED DATE: June 1994

DESCRIPTION:

Complete construction and initiate operations of expanded laboratory hot cells for high-level radioactive mixed waste.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE

DESCRIPTION

BASELINE

PROJECTED

NONE

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ACCOMPLISHMENTS

Continued construction on 222-S expansion for new hot cells. Buried pipe and duct installation is almost complete. Hot cell fabrication continues offsite. (,)

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Continue W-041H construction and fabrication activities.
- Start Project W-001 construction.

MILESTONE STATUS/PROBLEMS/ISSUES

The required date for authorization of additional funding for "Project W-001, 222-S Ventilation and Electrical System Upgrade" was extended from August 1992 to January 1993. This extension of the funding date (which also prevents a delay in the startup of the hot cell expansion) was made possible by lower than expected construction bids. Congress returned the reprogramming request to the Office of Management and Budget. Contingency plans are being developed.

MAJOR MILESTONE: M-12-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: T. M. Winctzak

BASELINE DATE: June 1992

PROJECTED DATE: COMPLETE

DESCRIPTION:

Submit Remedial Investigation/Feasibility Study (RI/FS) and RCRA Facility Investigation/Corrective Measures (RFI/CMS) Study Work Plans for 15 Operable Units (OUs).

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION

BASELINE PROJECTED

None.

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<u>ACCOMPLISHMENTS</u>

o None.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

o None.

MILESTONE STATUS/PROBLEMS/ISSUES

o Milestone M-12-00 is technically complete. However, EPA and Ecology have chosen to dispute the 100-NR-1 and 100-NR-2 work plans. Consequently, this milestone is in dispute.

MAJOR MILESTONE: M-13-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt MANAGER: T. M. Wintczak

BASELINE DATE: Annual Beginning CY93 PROJECTED DATE: Annual Beginning CY93

DESCRIPTION:

Submit Six Remedial Investigation/Feasibility Study (RI/FS) or RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plans per Year.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION

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None.

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<u>ACCOMPLISHMENTS</u>

O A Change Control Form was approved by DOE-RL and Regulators October 20, 1992, for the next six operable unit work plans to be drafted.

Milestone	OP Unit #	Submittal Dates
M-13-01	100-BC-2	02/28/93
M-13-02	200-UP-1	04/30/93
M-13-03	100-HR-2	06/30/93
M-13-04	200-ZP-1	08/31/93
M-13-05	100-DR-2	10/31/93
M-13-06	200-BP-5	12/31/93

o Drafting of 100-BC-2 and 200-UP-1 work plans commenced on October 1, 1992.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

Negotiate the Operable Unit work scope with regulators.

MILESTONE STATUS/PROBLEMS/ISSUES

o This milestone is on schedule.

MAJOR MILESTONE: M-14-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER: M. L. Bell

BASELINE DATE: January 1992

PROJECTED DATE: In Dispute

DESCRIPTION:

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Complete construction and initiate operations of a low-level mixed waste laboratory.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	BASELINE	<u>PROJECTED</u>
6 5	M-14-00	Complete construction and initiate operations of a low-level mixed waste laboratory.	January 1992	In Dispute

ACCOMPLISHMENTS

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Continued planning activities to provide analytical services to satisfy the proposed Dispute Resolution requirements.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

Sign agreement for resolution of dispute. 0

MILESTONE STATUS/PROBLEMS/ISSUES

The DOE-RL is developing a business plan to modify the existing Request 0 for Proposal (RFP) for laboratory services. The modified RFP will provide analytical services through existing commercial facilities while capabilities are established in the Tri-Cities area.

MAJOR MILESTONE: M-15-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt MANAGER: T. M. Winctzak

BASELINE DATE: September 2005 PROJECTED DATE: September 2005

DESCRIPTION:

Complete the Remedial Investigation/Feasibility Study (RI/FS) or RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Process for all Operable Units (OUs).

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

9	MILESTONE	DESCRIPTION	<u>BASELINE</u>	<u>PROJECTED</u>
ও অ	M-15-02A	Submit draft 200-BP-1 FS Phase 1/2 Report to EPA and Ecology.	06/93	06/93
<u>က</u>	M-15-04A	Submit draft 300-FF-5 F/S Phase 1/2 Report to EPA and Ecology.	07/15/93.	07/15/93
\mathcal{V}	M-15-01B/C	Submit final 1100-EM-1 RI/FS Report to EPA and Ecology.	12/92	12/92

ACCOMPLISHMENTS

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- o Sample analysis, data validation, for preparation of the RI Phase 1 and FS Phase 1 and 2 Reports for 300-FF-5 continued.
- o The 100-KR-1 Operable Unit 116-K-1 borehole drilling is complete.
- o The 100-FR-3 Drilling sites have completed installation of 13 wells, with 2 wells installed in October.
- o 100-BC-1 OU has completed all field activities for high priority . Samples analysis is complete. Data validation is complete. Interim milestone M-15-08A has been met.
- o The 100-NR-1 Operable Unit Surface Radiation report went out for clearance October 20, 1992.
- o The 100-BC-1 Operable Unit sent validated data to Regulators October 9, 1992.
- o Preparation of Safety documentation for the 618-11 burial ground ERA was initiated.
- o The ERA project plan for the Riverland ERA was issued to the regulators
- o Phase 1 Sampling activities for the North Slope ERA were completed

- o Preparation of a planning proposal for an ERA for the 200 West groundwater (per the AAMR's report recommendation) commenced.
- o The EE/CA for the Sodium Dichromate ERA was issued for review.

PLANNED ACTION(S) FOR THE NEXT 6 MONTHS

- o Complete Milestone M-15-01B/C, submit final 1100-EM-1 RI/FS Report to EPA and Ecology.
- o Sediment sampling along the shares of the Columbia River is expected to be initiated in November 1992.
- o Continue sample analysis, data validation, and evaluation will continue for preparation of the RI Phase 1 and 2 reports for the 300-FF-5 Operable Unit.
- o Disposition of Regulator comments from the 300-FF-1 RI Phase 1 report and FS Phase 1 and 2 reports will commence.
- o The contract for soil washing treatability at 300-FF-1 will be awarded.
 Procedures and supporting documents for the test will be prepared.
 - o Preparation of the risk assessment for the 300-FF-5 OU will continue.
- o Initiate preparation of the 200 Area wide IRM programmatic plan.
- o 100-HR-1, 100-DR-1, 100-HR-3, data validation will be complete in November 1992.
 - o 1st quarter groundwater sampling data will be validated for 100-BC-1 and 100-KR-4.
 - o 1st quarter groundwater sampling will be complete at 100-FR-3.
 - o The planning proposal for the 200 west groundwater ERA will be issued.
 - o Phase 1 Sampling activities for the Riverland Rail Wash Pit will be completed.
 - o The EE/CA for the North Slope ERA will be issued.
 - o Preparation of a planning proposal for an ERA for the 200 West groundwater (per the AAMR's report recommendation) will commence.

MILESTONE STATUS/PROBLEMS/ISSUES

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o This milestone is on schedule.

MAJOR MILESTONE: M-16-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: T. M. Wintczak

BASELINE DATE: September 2018

PROJECTED DATE: September 2018

DESCRIPTION:

Complete the Remedial Actions for all Operable Units (OUs).

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE

DESCRIPTION

BASELINE

PROJECTED

None.

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NOTE: START OF WORK FOR MILESTONE M-16-00 IS DEPENDENT ON COMPLETION OF STUDIES REQUIRED UNDER MILESTONE M-15-00. STATUS INFORMATION WILL

BE PROVIDED AT A LATER DATE.

MAJOR MILESTONE: M-17-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER: D. E. Kelley

M-17-00A:

BASELINE DATE: June 1995

PROJECTED DATE: June 1995

DESCRIPTION

Complete Liquid Effluent Treatment facilities/upgrades for Phase I effluents.

M-17-00B:

BASELINE DATE: October 1997

PROJECTED DATE: October 1997

DESCRIPTION

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Implement Best Available Technology/All Known, Available, and Reasonable 0 Methods of Prevention, Control, and Treatment (BAT/AKART) for all

Phase II liquid effluents at the Hanford Site.

PAST DUE OR SUPPORTING INTERIM MILESTONE(s) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION BASELINE **PROJECTED**

July 1993 July 1993 M-17-09A Complete definitive

design of '300 Area Treated Effluent Disposal Facility' (Project L-045H) and

submit design

documentation to the EPA and Ecology as a primary

document.

December 1992 December 1992 Limit UO3/U Plant M-17-17D

> Wastewater effluent flow to less than or equal to 250 gallons per minute,

averaged over the calendar month.

<u>ACCOMPLISHMENTS</u>

- Submitted delisting petition to EPA-Headquarters for the treated 0 effluent from the '242-A Evaporator/PUREX Condensate Treatment Facility' (i.e., Project C-018H) as required by interim milestone M-17-14C.
- Started construction in October 1992 on the Plutonium Finishing Plant 0 (PFP) Liquid Low-Level Waste System Modification, Project B-680H.

o 100% Design package on Project C-018H was received from the vendor and internal RL and contractor review of the design package was initiated.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- o Complete definitive design of the 200 Area Treated Effluent Disposal Facility (Project W-049H) collection system.
- o Complete 30% definitive design of the Project W-049H disposal system and initiate detailed definitive design work on the disposal system.
- o Initiate construction of the Project W-049H collection system.
- o Initiate construction of the '242-A Evaporator/PUREX Condensate Treatment Facility' (i.e., Project C-018H) process facility.
- o Complete design work on the 300 Area Treated Effluent Disposal Facility (Project L-045H) (M-17-09A).
- o Initiate negotiations on additional milestones containing the terms and conditions outlined by EPA and Ecology to allow continued discharges to the 300 Area Process Trenches.

MILESTONE STATUS/PROBLEMS/ISSUES

- o Milestone on schedule. Design work for the 300 Area Treated Effluent Disposal Facility (Project L-045H) proceeds ahead of schedule.
- Cology and EPA outlined the terms and conditions under which they would approve continued discharge of the 300 Area Process Sewer to the 300 Area Process Trenches. Conditions include abandonment of the western trench, additional flow restrictions, additional reporting requirements, installation of additional flow measuring devices. RL is evaluating the conditions and will initiate negotiations with the regulators on this issue.
 - o Compliance with all effluent flow restrictions contained in Tri-Party
 Agreement Milestone M-17 have been maintained.

MAJOR MILESTONE: M-18-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER:

R. J. Roberts

BASELINE DATE: March 1997

PROJECTED DATE: March 1997

DESCRIPTION

Complete Waste Receiving and Processing (WRAP) Module 1 Construction and Initiate Operations.

PAST DUE OR SUPPORTING INTERIM MILESTONE(s) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION

BASELINE

PROJECTED

None

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ACCOMPLISHMENTS

Continued discussions pertaining to the RCRA permit application at the monthly Tri-Party Agreement Unit Managers meeting.

№ 0 Received final approval of the Tri-Party Agreement Change Request, M-18-90-02. . ^

PLANNED ACTION(S) FOR NEXT 6 MONTHS

Continue Title 2 Design activities and complete 90% design.

MILESTONE STATUS/PROBLEMS/ISSUES

- This milestone is on schedule.
- Continuing to review application of Super Compactor design for use in 0 preparing the waste matrix for obtaining a representative sample. Other technologies and sampling methods are being investigated for obtaining a representative sample and analysis of the waste matrix.

MAJOR MILESTONE: M-19-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER:

R. J. Roberts

BASELINE DATE: September 1999

PROJECTED DATE: September 1999

DESCRIPTION

Complete Waste Receiving and Processing (WRAP) Module 2 Construction and Initiate Operations.

PAST DUE OR SUPPORTING INTERIM MILESTONE(s) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION

BASELINE

PROJECTED

None

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ACCOMPLISHMENTS

- RL responded to Ecology comments on draft Tri-Party Agreement Change Request M-19-91-01. This Change Request proposes the submodularization of the WRAP 2 project into WRAP 2A, the portion of the project that is not impacted by Waste Isolation Pilot Project (WIPP) uncertainties, and WRAP 2B, the portion of the project that is delayed due to technical uncertainties at the WIPP. Continued discussions with EPA and Ecology on the proposed WRAP 2 Tri-Party Agreement Change (i.e., Tri-Party Agreement Change Request M-19-91-01).
- RL submitted the TPA Change Request M-19-91-01 to EPA and Ecology for 0 approval.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Continue development of the Advanced Conceptual Design Report (ACDR) for 0 WRAP 2A.
- Continue with Waste Form Qualification testing. 0
- Initiate activities for the development of the WRAP 2A Preliminary 0 Safety Analysis Report.
- Complete an engineering study for WRAP 2B to develop alternatives for 0 transuranic treatment and recommendations for treatment. (proposed interim milestone M-19-03).
- RL approval of the WRAP 2A Technology and Development Plan. 0 will outline the testing and development requirements for technologies being considered for inclusion in the WRAP 2A waste treatment systems.

To resolve issues associated with Tri-Party Agreement Change Package M-19-91-01, the Ecology Unit Manager and other agency personnel will tour the WIPP, which is located near Carlsbad, New Mexico.

MILESTONE STATUS/PROBLEMS/ISSUES

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- Significant technical issues continue to exist regarding the WIPP waste acceptance criteria impact on the design of WRAP 2. The portion of WRAP 2 (i.e., WRAP 2B) that will receive and process transuranic (TRU) waste contaminated with hazardous waste (i.e, mixed TRU waste) is behind schedule. Design of WRAP 2B cannot proceed until the WIPP waste acceptance criteria issues are resolved. The portion of WRAP 2 that was not affected by the WIPP waste acceptance criteria (i.e, WRAP 2A) remains on schedule.
- o Because the design of WRAP 2 is tied to the WIPP waste acceptance criteria, the Key Decision 0 was made 6 months behind schedule. The schedule for WRAP 2 that reflects the impacts of the delay of KD-0 was reflected in the Tri-Party Agreement Change (Tri-Party Agreement Change M-19-91-01) transmitted to EPA and Ecology.

MAJOR MILESTONE: M-20-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: C. J. Geier

BASELINE DATE: MAY 1996

PROJECTED DATE: MAY 1996

DESCRIPTION:

Submit Part B permit applications or closure plans for all Resource Conservation Recovery Act treatment, storage, or

disposal units.

PAST DUE OR SUPPORTING INTERIM MILESTONE(s) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	BASELINE .	PROJECTED
	M-20-24	Submit PUREX Part B	Sept. 1992	Sept. 1992*
T	M-20-25	Submit Hanford Patrol Academy Demolition Site Closure Plan	Nov. 1992	Nov. 1992
<u></u>	M-20-26	Submit Ashpit Demolition Site	Nov. 1992	Nov. 1992
t inga		Closure Plan		
Ç	M-20-27	Submit Hexone Storage and Treat- ment Closure Plan	Nov. 1992	Nov. 1992
(t		ment crosure i run		
٠,٨	M-20-28	Submit E-8 Borrow Pit Demolition Site Closure Plan	Nov. 1992	Nov. 1992
~				
Q!	M-20-30	Submit 303-M Oxide Facility Part B	Oct. 1992	Oct. 1992*
*****	M-20-40	Submit 100-D Ponds Closure Plan	Feb. 1993	Feb. 1993
M	*See Milest	one Status/Issues		

<u>ACCOMPLISHMENTS</u>

o Received approval of Change Request to defer Milestone M-20-29, "Submit Maintenance and Storage Facility (MASF) Part B Application to Ecology and EPA", from November 1993 to a later date. The Change Request allows a period for DOE to determine the future use of the FFTF and the subsequent need for the MASF before establishing a new milestone.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- o Submit Hanford Patrol Academy Demolition Site Part B (M-20-25).
- o Submit Ashpit Demolition Site Closure Plan (M-20-26).

- o Submit Hexone Storage and Treatment Closure Plan (M-20-27).
- o Submit E-8 Borrow Pit Demolition Site Closure Plan (M-20-28).
- o Develop and submit 100 D Pond Closure Plan (M-20-40).

MILESTONE STATUS/PROBLEMS/ISSUES

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- o M-20-24, Submit PUREX Part B to Ecology and EPA. A Change Request to delay submittal of the Part B application for PUREX was transmitted to the regulators by RL. A new date for a Part B or a Closure Plan would be set after a final decision by DOE on the future status of PUREX. Ecology agreed to revising the M-20-24 date to 1995, but they requested a Closure Plan for the PUREX plant instead of a Part B Application. RL cannot commit to a closure plan at this time and has proposed wording to allow either a Part B or Closure Plan. RL responded to the Ecology letter and Ecology has verbally agreed to the change. The signed Change Request has not been received.
- o M-20-30, Submit 303-M Oxide Facility Part B to Ecology and EPA. A request to withdraw the Part A permit application for the 303-M Oxide Facility was prepared and transmitted to Ecology. Ecology denied the withdrawal request. RL prepared a response (sent to Ecology on October 22) opposing the Ecology denial. The current milestone (M-20-30) requires submittal of a Part B permit application by October 31, 1992. A Change Request to delete this milestone was transmitted to Ecology on October 30.

MAJOR MILESTONE: M-24-00 STATUS FOR END OF OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER: T. B. Veneziano

BASELINE DATE:

December 1992

PROJECTED DATE: December 1992

DESCRIPTION:

Install RCRA groundwater monitoring wells at the rate of 29 in calendar year (CY) 1989, 30 in CY 1990, and 50 per year thereafter until all land disposal units and SSTs are

determined to have RCRA compliant monitoring systems.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	BASELINE	PROJECTED
	M-24-00	Install 50 wells for CY 1992	Dec. 1992	Dec. 1992
7 6	M-24-22	Install one additional RCRA well around the 1324-N Pond (12 total)	Dec. 1992	Dec. 1992
<u>ක</u>	M-24-23	Install one additional well RCRA around the S-10 Pond and Ditch (7 total)	Dec. 1992	Dec. 1992
\$ \$2	M-24-26	Install two RCRA wells around the NRDWL (9 total)	Dec. 1992	Dec. 1992
<u>۸</u>	M-24-27	Install 2 additional RCRA wells around B-Pond (19 total)	Dec. 1992	Dec. 1992

ACCOMPLISHMENTS

- Completed drilling two additional wells. Drilling 26th well for CY 0 1992. Twenty-four are backpulled. Backpulling is in progress on the 25th well.
- Received approval of Change Request M-24-91-01A to establish interim 0 milestones for calendar year 1993 wells.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

- Continue drilling activities for CY 1992 wells. 0
- Initiate drilling activities for CY 1993 wells 0

MILESTONE STATUS/PROBLEMS/ISSUES

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- determined the locations for 26 sites to receive RCRA groundwater monitoring wells in CY 1992. Ecology has indicated technical agreement on reducing the CY 1992 milestone to require up to 30 wells to be drilled instead of the currently required 50 wells. The change package modifying the major milestone to read "up to 50 wells per year", consistent with the number of wells required in CY 1992, began a public review period in April 1992. Responses to the few public comments were received and the package was ready for signature in August. No modifications of the proposed change in the milestone were required. RL transmitted a letter on October 23 compiling all comments and responses to request final approval by Ecology and the EPA.
- o Drilling of twenty-five wells for CY 1992 has been completed, and twenty of these are sample ready.

MAJOR MILESTONE: M-26-00

STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: J. M. Hennig

MANAGER: C. J. Geier

BASELINE DATE: April 1993

PROJECTED DATE: April 1993

DESCRIPTION

Submit Annual Hanford Land Disposal Restrictions (LDR) Report in Accordance with the LDR Plan to Cover the Period from April 1 through March 31

PAST DUE OR SUPPORTING INTERIM MILESTONE(s) FOR NEXT 12 MONTHS

	MILESTONE	<u>DESCRIPTION</u>	BASELINE	<u>PROJECTED</u>
00 N	M-26-01C	Submit an annual Hanford Land Disposal Restrictions Report in accordance with the LDR Plan to cover the period from April 1 of the	4/30/93	4/30/93
Ç		previous year through March 31 of the reporting	1	
S		year.		
44.				

<u>ACCOMPLISHMENTS</u>

No significant accomplishments this month. **~** 0

PLANNED ACTION(S) FOR NEXT 6 MONTHS

The Contractor is scheduled to initiate work on the 1993 LDR Report in 0 0 November, 1992. The contractor is scheduled to issue the preliminary draft 1993 LDR Report for RL review in March 1993.

MILESTONE STATUS/PROBLEMS/ISSUES

This milestone is on schedule.

MAJOR MILESTONE: M-27-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: T. M. Winctzak

BASELINE DATE: September 1992

PROJECTED DATE: COMPLETE

DESCRIPTION:

Submit all Aggregate Area Management Study Reports (AAMSR) for the 200 Area to EPA and Ecology as secondary documents.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE

DESCRIPTION

BASELINE PROJECTED

None.

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ACCOMPLISHMENTS

o Submitted the 200 East Groundwater AAMSR to the regulators, completing Interim Milestone M-27-11. This completes Milestone M-27-00.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

o Disposition of regulator comments and approval of the AAMSR reports.

MILESTONE STATUS/PROBLEMS/ISSUES

o This milestone is complete.

MAJOR MILESTONE: M-29-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: T. M. Wintczak

BASELINE DATE: March 1992

PROJECTED DATE: COMPLETE

DESCRIPTION:

Develop and Submit Documentation to EPA and Ecology Describing Hanford Risk Assessment Methodology.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE DESCRIPTION

BASELINE PROJECTED

None.

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ACCOMPLISHMENTS

o None.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

o None.

MILESTONE STATUS/PROBLEMS/ISSUES

o None.

MAJOR MILESTONE: M-30-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. D. Izatt

MANAGER: T. M. Winctzak

BASELINE DATE: September 1993

PROJECTED DATE: September 1993

DESCRIPTION:

Complete Integrated General Investigations and Studies for the 100 Area.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

MILESTONE	DESCRIPTION	<u>BASELINE</u>	<u>PROJECTED</u>
M-30-05	Complete installation of all field instrumentation and initiate monitoring activities necessary to perform long-term Aquifer River Investigations.	09/93	09/93

<u>ACCOMPLISHMENTS</u>

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No significant accomplishments this reporting period.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

Ecological investigations continue on lower priority Operable Unit.

MILESTONE STATUS/PROBLEMS/ISSUES

o This milestone is on schedule.

MAJOR MILESTONE: M-31-00 STATUS FOR END OF MONTH: OCTOBER 1992

DOE DIRECTOR: R. W. Brown

MANAGER: R. L. Fritz

BASELINE DATE: TBD

PROJECTED DATE: TBD

DESCRIPTION:

Provide additional double-shell tank capacity. Construction complete.

PAST DUE OR SUPPORTING INTERIM MILESTONE(S) FOR NEXT 12 MONTHS

	MILESTONE	DESCRIPTION	BASELINE	PROJECTED	
S	M-31-02	Recommend additional tank milestones.	09/30/92	08/31/93	
		· · · · · · · · · · · · · · · · · · ·			

ACCOMPLISHMENTS

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The conceptual design has been completed and was submitted to Ecology and the EPA with draft change request M-31-92-02. The change request outlines proposed future milestones for M-31-00 and meets the commitment for completing Milestone M-31-01.

PLANNED ACTION(S) FOR NEXT 6 MONTHS

o. Resolve the issues associated with the Ecology denial of the M-31-92-03 change request.

MILESTONE STATUS/PROBLEMS/ISSUES

o A change request has been developed to allow the deferral of the evaluation of additional double-shell tank capacity needs (M-31-02) until after the completion of the TWRS rebaselining effort. The change request was denied based on the timeliness of the request. RL will enter dispute resolution to resolve this interim milestone issue.

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